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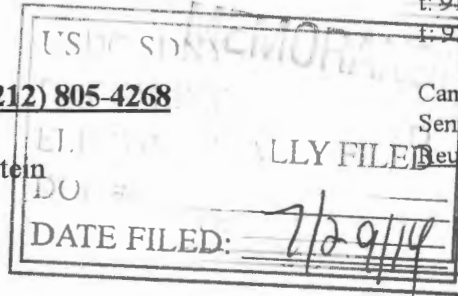
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July 25, 2014

**VIA ECF and FACSIMILE to (212) 805-4268**

The Honorable Gabriel W. Gorenstein  
 United States Magistrate Judge  
 Southern District of New York  
 500 Pearl Street  
 New York, New York 10007



Re: *Ritani, LLC v. Harout Aghjayan, et al.*  
 1:11-cv-08928 (RWS)(GWG) (SDNY)

Dear Judge Gorenstein:

We are counsel for Plaintiff in the above-referenced action. We write jointly with counsel for Defendants to submit the parties' joint proposal for completion of discovery contemplated at the last discovery conference held before Your Honor on June 19, 2014.

**Proposed Discovery Plan**

The proposed plan is as follows:

1. The deadline for parties to complete fact discovery is October 10, 2014.
2. The deadline for parties to submit all expert disclosures (e.g., reports) required by Rule 26 is October 17, 2014.
3. The deadline for parties to submit expert rebuttal disclosures is November 18, 2014.
4. The deadline for parties to complete all discovery is December 17, 2014.

The parties shall inform each other in writing as to whether any intends to file a dispositive motion by December 23, 2014. The disclosure shall generally state the issues upon which summary judgment shall be sought. The parties shall meet and confer regarding a summary judgment briefing schedule by January 9, 2015, which shall be submitted for court approval by January 15, 2015. If no party intends to file a summary judgment motion, the parties shall meet and confer by no later than February 2, 2015, regarding the scheduling of trial and preparation and submission of pretrial order materials consistent with Judge Sweet's Individual Practices.

Wherefore, the parties respectfully request endorsement and entry into the record of the proposed case management schedule outlined above.

Respectfully submitted,

Cameron S. Reuber

*Granted*

cc: Counsel for Defendants (by ECF)

SO ORDERED: DATE: 7/25/14  
  
 GABRIEL W. GORENSTEIN  
 UNITED STATES MAGISTRATE JUDGE